

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**THIRD SET OF INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TAYMAN
(UPS/USPS-T9-7)**

(September 15, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory directed to United States Postal Service witness Tayman (UPS/USPS-T9-7).

Respectfully submitted,



John E. McKeever
Albert P. Parker
Stephanie Richman
Attorneys for United Parcel Service

Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

**INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TAYMAN**

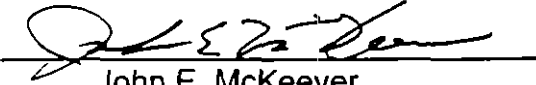
UPS/USPS-T9-7. (a) Please confirm that Attachment 1 is a radio script for an advertising spot for Parcel Post that ran on November 27, 1996. If not confirmed, please explain why you are unable to confirm.

(b) Please confirm that Attachments A and B are print advertisements promoting Parcel Post that appeared in one or more publications at least once during fiscal year 1996. If not confirmed, please explain why you are not able to do so, and what Attachments A and B are.

(c) If either (a) or (b) is confirmed, please explain why Attachment I to the response to interrogatory UPS/USPS-4 (dated August 15, 1997) indicates that no costs were incurred by the Postal Service in fiscal year 1996 to advertise Parcel Post.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


John E. McKeever

Dated: September 15, 1997
Philadelphia, Pa.



330 West 42nd Street, New York, NY 10036
(212) 734-8018 / Fax: (212) 734-8104
600 West Sunset Blvd., Los Angeles, CA 90028
(213) 973-9777 / Fax: (213) 973-7545
212 West Superior Street, Chicago, IL 60610
(312) 649-1131 / Fax: (312) 649-1137
1930 Chestnut Street, Philadelphia, PA 19103
(215) 546-9990 / Fax: (215) 363-1945
730 Mission Street, San Francisco, CA 94107
(415) 543-3367 / Fax: (415) 543-8148

26400 Lorain Road, Suite 372, Richmond, VA 23034
(819) 382-9220 / Fax: (819) 382-9226
361 Newbury Street, Boston, MA 02115
(617) 388-9721 / Fax: (617) 388-1301
8711 Lei Avenue, Dallas, TX 75251
(214) 644-9666 / Fax: (214) 644-9665
1008 Morrison Press Building, Washington, DC 20046
(202) 393-7110 / Fax: (202) 393-8451
10240 Westheimer, Suite 310, Houston, TX 77042
(713) 794-1635 / Fax: (713) 794-0980

2725 Sycamore Boulevard, Miami, FL 33137
(305) 634-5641 / Fax: (305) 674-3209
One Montgomery, Suite A210, Denver, CO 80202
(303) 733-8880 / Fax: (303) 733-8080
67 Prospect Avenue, Hartford, CT 06108
(603) 258-8442 / Fax: (603) 258-0881
1061 Fifth Avenue, San Diego, CA 92101
(619) 544-1840 / Fax: (619) 544-0730

TRANSCRIPT

DATE: **NOVEMBER 27, 1985**
TIME: **7:42AM**
STATION: **WGN-AM**
LOCATION: **CHICAGO**
PRODUCT: **US POSTAL SERVICE**
LENGTH: **:30**
CODE: **9511-4287L6**

TITLE: **UP TO 70 POUNDS**

(MUSIC)

WOMAN SINGS: Twelve snugly sweaters, eleven ornate picture frames, ten brand new laptops--

MALE ANNCR: No matter what you choose to send this holiday season, there's no better value anywhere than Parcel Post from the US Postal Service.

WOMAN SINGS: Four jigsaw puzzles, three silky dresses--

MALE ANNCR: We offer low cost insurance for extra protection and you can even ship up to seventy pounds.

WOMAN SINGS: And one really humongous fruit cake.

MALE ANNCR: Parcel Post from the Postal Service. Another way we're helping you handle the holidays.

(MUSIC OUT)

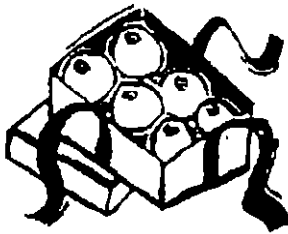
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Smart Solutions™

NUMBER 19-PARCEL POST



Person has mail order business.



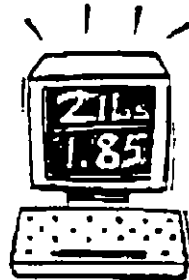
Is shocked by high shipping costs.



Goes to Post Office instead.

PARCEL POST

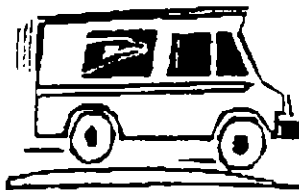
Finds out Parcel Post is a very smart solution



Doesn't cost much.*



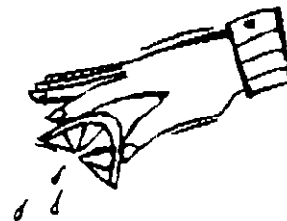
Gives big discounts for bulk mailing.



Even picks up for a minimal fee.



Person is delighted. Thanks Post Office profusely



Now he can sell fruit without getting squeezed

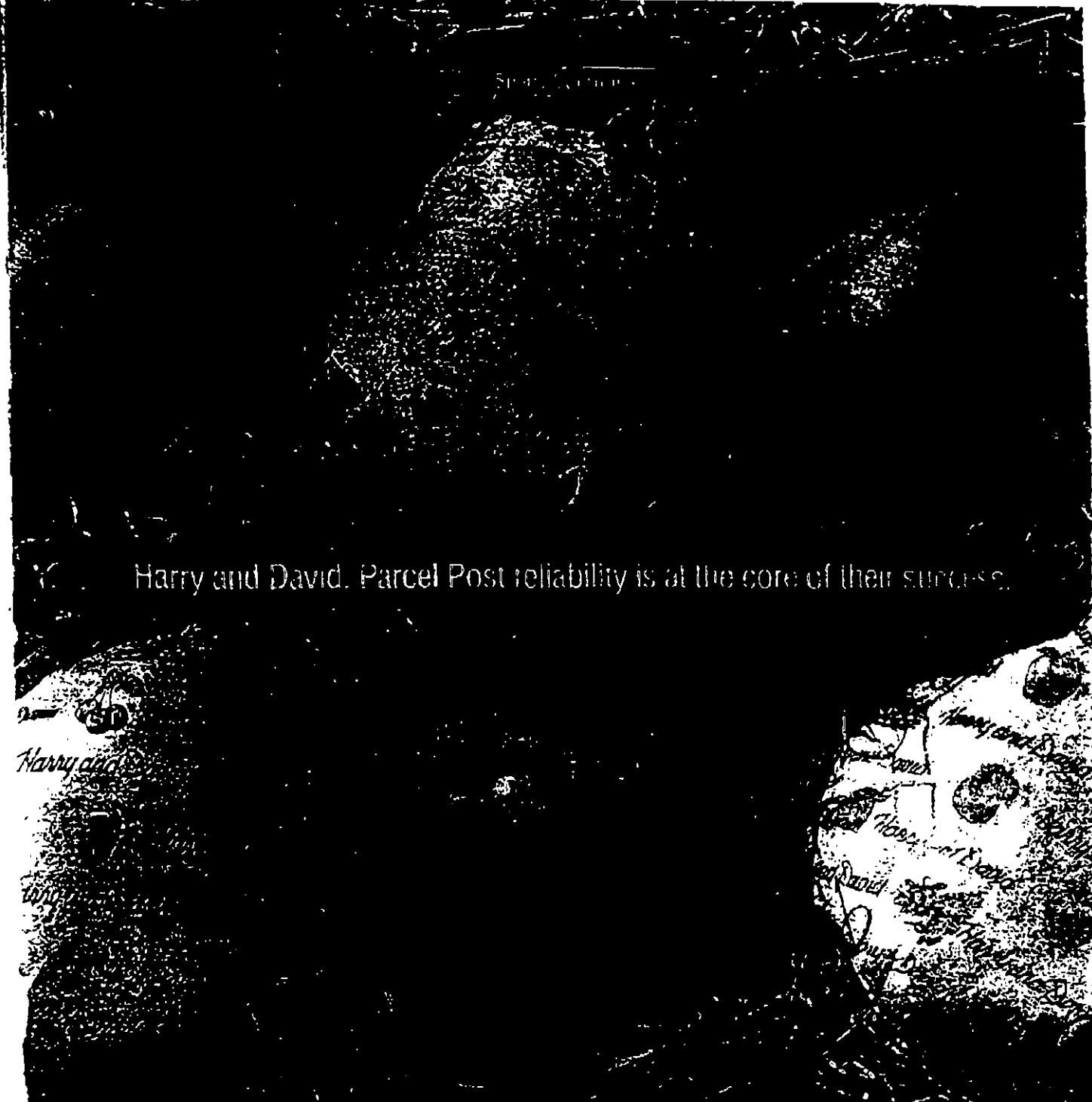
For a Parcel Post guide, call 1-800-THE-USPS, ext. 785.

*Some restrictions apply. Check your Post Office for details.

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^{value}
We Deliver For You.





Harry and David. Parcel Post reliability is at the core of their success.

Over 40 years ago, Harry and David® turned to the United States Postal Service to help grow their business. It was a smart solution. And they're still depending on the mail — both to generate orders and deliver the goods.

This year, Parcel Post will deliver over 4 million packages of Royal Riviera® pears and other perishable Harry and David gifts. On time, in shape — and for about \$1 less per parcel than other carriers would charge.

Get a free Parcel Services Business Kit that shows ways we'll deliver for you — reliably and economically. Mail the reply card or call 1 800 THE USPS, Ext. 1184.

